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June 24, 2020

Joshua Siegel, Esquire
Cooley, LLP
299 Pennsylvania Avenue, NW
Suite 700
Washington, DC 20004-2400
Via Electronic Mail: jsiegel@cooley.com

RE: Sines v. Kessler

Dear Mr. Siegel,

Ms. Lunsford and I are preparing to comply with Judge Hoppe's order in regard to your subpoena. Our files are voluminous and the costs associated with your request to our small practices will be burdensome. Perhaps you could assist us in this regard by providing direction as to the items in which you are interested.

Our files which may be responsive to your requests #'s 1, 2, 3, 5, 6, 7, 8, 9, 10, 11 and 12. generally consist of the following:

1. Pleadings.
2. Trial preparation
3. Discovery obtained directly from the Commonwealth of Virginia.
4. Discovery obtained from the United States Government either directly or thru the Commonwealth.
5. Jury information including questionnaires.
6. Documents obtained from the Clerk of the City of Charlottesville Circuit Court
7. Local, regional and national media accounts of the events leading to the arrest of Mr. Fields and the Unite the Right Rally.
8. Unsolicited e-mails from third parties.

9. Historical information about our client obtained from schools, medical care providers and the United State Army

A response to request # 4 could conceivably consist of our entire file except for those items protected by the work product doctrine.

When we spoke last week in response to my request for some direction you suggested the reports from the Charlottesville Police Department and the Accident Reconstructionist would be responsive. As these were provided to us directly by the Commonwealth and as the Commonwealth had waived any objection to the release that was provided to you. If there are other items which you believe to be under our control and which are not protected by previous orders of the court or the work-product doctrine please let us know and will we attempt to comply.

Ms. Lunsford and I would like to avoid spending time for which we will not be reimbursed sorting thru files and creating privilege logs if there are specific identifiable items which you need and which can be quickly provided.

Thanks for your consideration of this request. I am,

Sincerely,
POINDEXTERHILL, P.C.

John I. Hill
John I. Hill

JIH/zrw